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**VIA ELECTRONIC SUBMISSION**

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Memorandum of Ex Parte Presentation**  
**CC Docket No. 95-155, Toll Free Service Access Codes**

Dear Ms. Dortch:

On May 6, 2003, Michael Del Casino of AT&T, Kathy Levitz of BellSouth, Hank Hultquist of MCI, John Kure of Qwest, Marie Breslin and Michael O'Connor of Verizon, Norina Moy of Sprint, and William A. Brown and the undersigned of SBC met separately with:

- Chris Libertelli, Chairman Powell's legal advisor,
- Lisa Zaina, Commissioner Adelstein's senior legal advisor,
- Jessica Rosenworcel, Commissioner Copps' legal advisor,
- Sam Feder, Commissioner Martin's legal advisor.

During the meetings, the group discussed and advocated the transfer of the management and ownership of the Toll Free Database to a Limited Liability Corporation. The attached material was used as a basis for discussion in the meetings.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter and attachment are being electronically filed. I ask that this letter be placed in the files for the proceedings identified above.

Please call me should you have any questions.

Sincerely,

/s/ Brian J. Benison

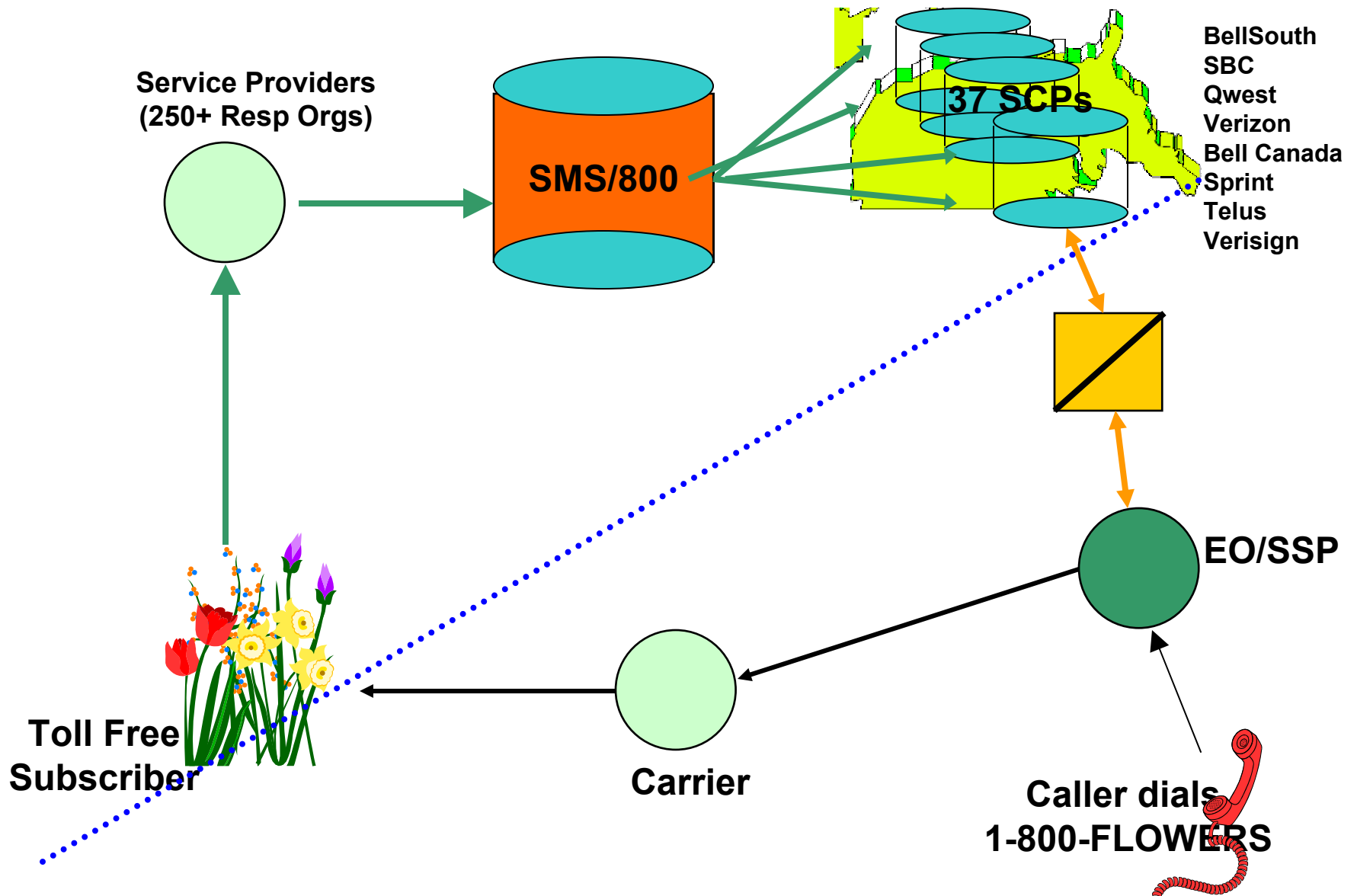
CC: Chris Libertelli  
Lisa Zaina  
Jessica Rosenworcel  
Sam Feder

# **Management & Ownership of the Centralized Toll Free Database by an LLC\***

*AT&T, Bell Canada, BellSouth,  
MCI, Qwest, SBC, Sprint, Verizon*

\* Limited Liability Corporation

# How does toll-free service work?



# **Centralized Toll Free Database Service**

- Currently is jointly provided by BellSouth, Qwest, SBC, and Verizon
- Some Resp Orgs have suggested that a change in ownership would enhance neutrality and lead to greater efficiencies
- The FCC should authorize the transfer of responsibility for the centralized toll free database service to an LLC, both as a long term solution and on an interim basis
- Industry awaiting FCC NPRM

# **Existing North American Portability Management LLC**

*(NAPM, LLC)*

- Industry formed LLC to manage Number Portability Administration Center (NPAC database)
- LLC includes members from all industry segments
- LLC Operating Agreement provides equal voice through inclusive membership covenants
- LLC selected vendors based on a fully competitive RFP process
- LLC manages NPAC functionality in a competitively neutral and non-discriminatory manner
- LLC has proven it can effectively and efficiently manage the NPAC database

# LLC Benefits

- Broad-based support:
  - Resp Orgs, representing more than 90% of toll free numbers, support LLC solution
  - Support includes large and small Resp Orgs
- An interim LLC can be formed on an accelerated schedule
- Industry has proven an LLC can ensure neutrality of database service and operate in a competitively neutral & non-discriminatory manner
- An LLC works in a cooperative industry context
- Resp Orgs determine centralized toll free service functionality and enhancements
- FCC retains oversight